

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

SHELDON G. ADELSON,
Plaintiff,

V.

MOSHE HANANEL,
Defendant.

Civil Action No.

04-cv-10357-RCL

INITIAL DISCLOSURES OF MOSHE HANANEL

Defendant Moshe Hananel ("Hananel") makes the following initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1).

A. The name, and, if known, the address and telephone number of each individual likely to have discoverable information that Hananel may use to support his defenses, unless solely for impeachment, identifying the subjects of the information, in addition to Mr. Hananel himself:

1. Mrs.Huggatt Elhadad-

10 Maapo St. Tel Aviv-Jaffa

Adelson's contracting with Hananel in Israel (including before December 1995), Hananel's work, and other matters.

2. Mr.Majali Wahaba-

153 Beit G'an

Hananel's work with Adelson on casino development and other matters.

3. Mrs. Miriam Cohen

65 Mendel St. Kiriat Kerinzi, Ramat Gan

Adelson's contracting with Hananel in Israel, Hananel's work, and other matters.

4. Alex Grinwald

13 Hatomer St. Givat Shemuel

Adelson's contracting with Hananel in Israel, Hananel's work, and other matters.

5. Max Blankstein-

1 Mevo Pal Yam St. Jerusalem

Hananel's work with Adelson on casino development and other matters (including before December 1995)..

6. Itach David

1130 Herzel St. Beith Shemesh

Hananel's work with Adelson (including before December 1995)..

7. Oded Efrat

41 Zofit St. Zofit

Hananel's work with Adelson on casino development and other matters.

8. Lees Arie

5 Keren Hayesod St. Ramat Hasharon

Hananel's initiation of the Macau project and other matters.

9. Miro David-

645 Keren Hayesod St. Beith Shemesh

Hananel's work with Adelson on casino development, Hananel's initiation of Macau project, and other matters.

10. Koubi Ariel (Arik)

39-3228 Raleigh St.
Port Coquitlam, BC V3C 3J5, Canada

Adelson's March 2000 visit to Macau and other matters.

11. Galit Kerner-
29 Harav Maor Yousef St. Rehovot

Hananel's work for IPI, Galilee and Adelson

12. Mr. Dan Tichon-

5 Hanamer St. Jerusalem

Hananel's work with Adelson on casino development and other matters.

13. Mr. Avi Hefetz-

22 Kanfey Nesharim st. Jerusalem 95464

Hananel's work with Adelson on casino development and other matters.

14. Mr. Dermot Dwyer

Dublin, Ireland

Hananel's work with Adelson on casino development and other matters.

15. Mrs. Kittie Chan

Veng Fai, Macau Tel (853)972553

Macau casino project.

16. Melnick Moshe-

28 Bareket St. Ramat Efal

Melnick's work and Hananel's work for Adelson and other matters.

17. Richard Suen-

Address in care of his attorneys John A. O'Malley, Esq., FULBRIGHT & JAWORSKI L.L.P - 555 South Flower St., Forty-First Floor Los Angeles, CA 90071 and James J. Pisanelli, Esq. BROWNSTEIN HYATT FARBER SCHRECK P.C. 300 South Fourth St. Suit 1200 Las Vegas, NV 89101.

Macau casino project.

The following witnesses have been described by Adelson in the Consolidated Israeli Action as having knowledge. Hananel does not vouch for their testimony at this time.

18. Atty. Jorge Neto Valente

Av. Dr. Mario Sqaes, 25 Edif. Montepio Ap. 25-2 Macau, China

Macau casino project.

19. Mr. Edmund Ho-Chief Executive of Macau SAR-

Address: Macau, China

Macau casino project.

20. Sheldon G. Adelson

In care of his counsel.

Adelson's contracting with Hananel in Israel, application of Israeli law to the contract, Hananel's work for Adelson, including casino development and initiation of the Macau casino project.

21. Paul Kaye- Adelson's ex-pilot.

Macau casino project.

22. Shon Ben Menachem

NASTEC
5000 North Parkway CALABASAS Suit 106
Calabasas, USA

Macau casino project.

23. Dan Raviv

Adelson employee. 3A Jabotinsky st. Diamond Tower, IPI, Ramat Gan, Israel 972-3-613-1994

Hananel's work for Adelson, including casino development and Macau casino project.

24. Atty. Daniel Chynn

39 Kefar Etzion, Jerusalem, Israel. He was a lawyer for Adelson in Israel.

Hananel's work for Adelson on casino development.

25. Mr. Doron Bitan-

Adelson employee..

Macau casino project.

26. William P. Weidner

Adelson employee; 3355 Las Vegas Blvd. Las Vegas, NV 89109

Macau casino project.

27. Matthew Ma

Address: Adelson ex-employee.

Macau casino project.

28. Dr. Jorge Manuel Faria da Costa Oliveira

Macau Gaming Commission,
Edificio China Plaza, Macau SAR, Tel: 853712783.

Macau casino project.

29. Paul G. Roberts, Esq.,

Address: Adelson employee.

Adelson's contracting with Hananel in Israel, application of Israeli law to contract.

30. David Farbstein-

43 Yotam St. Haifa, Israel. Adelson relative.

Hananel's work for Adelson and other matters.

31. Mrs. Ivy Yip-

Address: Adelson employee.

Macau casino project.

32. William (Billy) Boyle-

Address: Adelson employee.

Macau casino project and visits.

33. Betty Ann Yurcich
Adelson's secretary in 1995 and at other times, c/o Mr. Adelson

Adelson's contracting with Hananel in Israel.

B. Description by category and location of all documents, electronically stored information, and tangible things that are in the possession, custody or control of Hananel and that Hananel may use to support his defenses, unless solely for impeachment:

1. Affidavits, motions, exhibits, and other documents submitted, disclosed, and/or produced by the parties (including Adelson and IPI) in the Consolidated Israeli Action (Labor Court Nos. 6245/01,7704/03), all of which are located in Adelson's possession, custody and control directly or with his counsel.
2. Affidavits, motions, exhibits, and other documents submitted, disclosed, and/or produced by the parties (including IPI) in the 2002 Israeli Action (Labor Court No. 9015/02), all of which are located in Adelson's possession, custody and control directly or with his counsel.
3. Court decisions, court protocols, and trial exhibits, in the Israeli Consolidated Action and the 2002 Israeli Action all of which are located in Adelson's possession, custody and control directly or with his counsel.
4. Affidavits, motions, exhibits, and other documents submitted, disclosed, and/or produced by the parties in the action *Suen v. Adelson*, Clark County, Nevada Case No. A-493744, all of which are located in Adelson's possession, custody and control directly or with his counsel.
5. Affidavits, motions, exhibits, and other documents submitted, disclosed, and/or produced by the parties in the present action, all of which are located in Adelson's possession, custody and control directly or with his counsel.

C. Computation of damages.

Adelson has testified under oath that Hananel will get "2-3 billion dollars" if Hananel wins the Consolidated Israeli action, of which the present action is a duplicate as to the Macau claim. Hananel is as yet unable to compute damages.

D. Insurance agreements.

None.

MOSHE HANANEL
By His Attorneys,

Dated: March 31, 2008

/s/ James A. G. Hamilton
James A. G. Hamilton (MA Bar # 218760)
Lawrence G. Green (MA Bar # 209060)
BURNS & L;EVINSON LLP
125 Summer Street
Boston, MA 02110
617-345-3000

Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on March 31, 2008.

/s/ James A. G. Hamilton

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